

Mr. Raymond Cole
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

11th June 2020

Dear Mr. Cole,

Application Ref.: F/4/20/OUT

Applicant: Redrow Homes Southern Counties and Wates Developments Ltd

Proposal: Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm. of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail/ commercial (Use Classes A1-A5) and 1,450 sqm community/ leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding.

Location: Land at Ford Airfield Ford

I refer to the above planning application by Redrow Homes Southern Counties and Wates Developments (the Applicant) and the recent submission of a Waste Infrastructure Statement prepared by Barton Willmore on behalf of the Applicant.

I should be grateful if you would take account of the representation below in addition to our previous representation dated 27th March 2020.

The Waste Infrastructure Statement provides a very brief analysis of how close the existing waste management facilities are to the application area. This is exactly why concern has been raised over the potential for the proposed development to impact on the existing and future operations of those identified waste management facilities.

Each of those facilities is likely to have a planning permission and/or a waste management licence/permit that have conditions relating to operating hours and their emissions to the environment (such as noise, fugitive emissions and odour) which apply to those existing sensitive receptors that were known at the time of application and could be identified by the waste management operators and regulatory bodies such as West Sussex County Council, Arun District Council and Environment Agency. To expect those requirements to apply to new sensitive receptors that are in much closer proximity than existing sensitive receptors is an unsound approach and ignores the Agent of Change principle set out in paragraph 182 of the NPPF.

It is clear from the information provided that the Applicant has not considered the potential impact of the development proposals on potential future operations at Ford CTP and instead has continued to focus on the existing operations at Ford CTP. This is acknowledged by the Applicant in paragraph 1.4 of the Waste Infrastructure Statement:

"It demonstrates how the proposals can be successfully delivered without preventing or prejudicing the operations of existing waste facilities."

The Applicant and their representatives are aware of the proposals under development by Ford Energy from Waste Limited and although a detailed planning application has not yet been submitted to West Sussex County Council there are in excess of 60 similar facilities currently operational throughout the UK which the applicant could have based a comparable assessment on.

Notwithstanding this, the planning application for the Waste Sorting and Treatment Facility (WSTF) and Energy Recovery Facility (ERF) on the Strategic Waste Allocation at Ford CTP is now close to completion and it is expected to be submitted to West Sussex County Council towards the end of June 2020. This will be a full planning application supported by a comprehensive Environmental Impact Assessment setting out detailed proposals and will contain in-depth assessments on a variety of topics including noise, air quality and cumulative impacts. We consider it entirely appropriate that the Applicant is required to revisit his Outline Planning Application to take on board the details of this forthcoming planning application.

Based on the information provided to date, we have no option but to maintain our objection to the planning application.

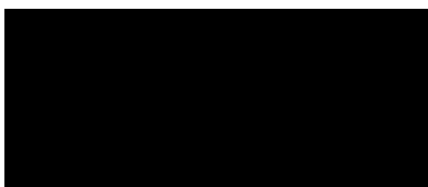
As per our previous representation, we would strongly encourage both Arun District Council and the Applicant to work with all adjoining waste management operators to develop a scheme that works for everyone.

We are happy to attend any meeting with you and the developer to discuss the issues in more detail.

I should be grateful if you would confirm receipt of this response and keep me informed of any developments related to this application.

I look forward to hearing from you.

Yours sincerely,



Paul McLaughlin MRTPI MCIWM

**Project Manager
Ford Energy from Waste Limited**